IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No.   :   10/083,250
Applicant   :   Geoffrey Stiff et al.
Filed   :   February 27, 2002
TC/A.U.   :   3694
Examiner   :   Matthew Osbourne

Docket No.   :   52493.000251
Title   :   METHOD AND SYSTEM FOR GUARANTEEING MINIMUM
                     :   PERIODIC RETIREMENT INCOME PAYMENTS USING AN
                     :   ADJUSTMENT MODULE
                     :
Customer No.   :   **21967**

Mail Stop AMENDMENT
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

CORRECTED RESPONSE TO RESTRICTION REQUIREMENT

Sir:

Responsive to the Office Action dated February 23, 2007, imposing a restriction

requirement between the pending claims of the above application, <u>Applicant hereby elects</u> Group

IV, which comprises claims 30-36. This election is made <u>with traverse</u>. In addition Applicant

adds new claims 45-57. The pending claims are included in Appendix A.

Accordingly, please cancel the remaining claims as set forth in Appendix A. This

cancellation is made without prejudice, waiver, or disclaimer. If there are any fees due under 37

C.F.R. § 1.116 or §1.117 which are not enclosed herewith, including any fees required for an

extension of time under 37 C.F.R. § 1.136, please charge such fees to our Deposit Account No.

50-0206.

If Applicant or its representative may be of any assistance to the Patent Office in

connection with this matter, the undersigned counsel would welcome a telephone call or other

communication from the Patent Office.

Respectfully submitted,

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APPENDIX A

IN THE CLAIMS:

1.-29. (Canceled)

30. (Original) A system for providing a user with a plurality of guaranteed minimum retirement income payments, comprising:

an equity module to receive an income generating payment and to output a periodic retirement income payment amount wherein the periodic retirement income payment amount is greater than, equal to, or less than a guaranteed minimum periodic retirement income payment amount if the income generating payments received are received according to a predetermined payment schedule; and

an adjustment module for comparing the periodic retirement income payment amount and the guaranteed minimum periodic retirement income payment amount, and for outputting to the user at least the guaranteed minimum periodic retirement income payment amount, with the adjustment module storing a balance in an adjustment account if the periodic retirement income payment amount is less than the guaranteed minimum periodic retirement income payment amount.

31. (Original) The system of claim 30 wherein the equity module comprises at least one of a variable annuity module, a fixed annuity module, a mutual funds module, a variable life module, a single premium immediate annuity (SPIA) module, and an immediate variable annuity module.

32. (Original) The system of claim 30 wherein the periodic retirement income payment may be calculated at one of the following annually, biennially, semi-annually, quarterly, monthly, bi-monthly, semi-monthly, weekly, and bi-weekly.

33.   (Original) The system of claim 30 wherein the guaranteed minimum periodic retirement income payment amount may be calculated at one of the following annually, biennially, semi-annually, quarterly, monthly, bi-monthly, semi-monthly, weekly, and bi-weekly.

34.   (Original) The system of claim 30 wherein the adjustment account balance is recovered by the performance of a unitized investment trust or an index.

35.   (Original) The system of claim 30 wherein the guaranteed minimum periodic retirement income payment amount is predetermined by the user.

36.   (Original) The system of claim 30 wherein the guaranteed minimum periodic retirement income payment amount is predetermined by the total premium payments made by the user during an accumulation period.

37.-44. (Canceled)

45.   (New) The system of claim 30 wherein the output of the adjustment module to the user is based on the balance in the adjustment account.

46.   (New) The system of claim 30 wherein the output of the adjustment module to the user is equal to the periodic retirement income payment amount, if the adjustment account balance is zero and the periodic retirement income payment amount is greater than the guaranteed minimum periodic retirement income payment amount.

47.   (New) The system of claim 30 wherein the income generating payment comprises a plurality of predetermined scheduled premium payments.

48.   (New) The system of claim 30 wherein the income generating payment comprises a plurality of predetermined premium payments.

49.   (New) The system of claim 30 wherein the income generating payment comprises a single premium payment.

50.   (New) The system of claim 39 wherein the income generating payment comprises a plurality of premium payments.

51.   (New) The system of claim 30 wherein the guaranteed minimum periodic retirement income payment amount is determined by the amount and timing of the premium payments made by the user during the accumulation period.

52.   (New) The system of claim 30 wherein the adjustment account balance is forgiven as a death benefit during the annuitization period or at the expiration of the certain period, whichever occurs later.

53.   (New) The system of claim 30 wherein an administrator retains a secured interest in future periodic retirement income payment amounts, if the adjustment account reflects a balance.

54.   (New) The system of claim 52 wherein the administrator is a financial services carrier.

55.   (New) A method for providing a user with a plurality of guaranteed minimum retirement income payments, comprising:

receiving an income generating payment at an equity module;

outputting a periodic retirement income payment amount, using the equity module, wherein the periodic retirement income payment amount is greater than, equal to, or less than a guaranteed minimum periodic retirement income payment amount if the income generating payments received are received according to a predetermined payment schedule, and wherein the guaranteed minimum periodic retirement income payment amount is defined by the user;

comparing the periodic retirement income payment amount and the guaranteed minimum periodic retirement income payment amount using an adjustment module;

outputting, using the adjustment module, to the user at least the guaranteed minimum periodic retirement income payment amount, the adjustment module storing a balance in an adjustment account if the periodic retirement income payment amount is less than the guaranteed minimum periodic retirement income payment amount.

56.   (New) The method of claim 54 further comprising the step of forgiving the adjustment account balance as a death benefit during the annuitization period or at the expiration of the certain period, whichever occurs later.

57.   (New) The method of claim 30 wherein the equity module comprises and equity indexed annuities or an equity indexed immediate annuities.

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